

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

WOOJAE (STEVE) JUNG,

Defendant, and

SUNGROK HWANG,

Relief Defendant.

Case No. 1:18-cv-04811-JGK

**PLAINTIFF SEC'S RULE 41(a)(1)(A)(i) NOTICE OF VOLUNTARY DISMISSAL  
OF ITS UNJUST ENRICHMENT CLAIM AGAINST RELIEF DEFENDANT HWANG**

Plaintiff Securities and Exchange Commission ("SEC") respectfully submits, in accordance with Fed. R. Civ. P. 41(a)(1)(A)(i), the following notice of voluntary dismissal as to the Third Claim for Relief alleged in its complaint, which asserts an action for unjust enrichment against relief defendant Sungrok Hwang:

On May 31, 2018, the SEC filed its complaint in this civil enforcement action. Dkt. No.

1. The SEC's first and second claims for relief alleged that defendant Woojae (Steve) Jung violated the antifraud provisions of the federal securities laws by engaging in illegal insider trading. *Id.* at ¶¶ 140-152. On September 19, 2019, the commissioners of the SEC approved a proposed settlement with defendant Jung, and counsel for the SEC has concurrently filed with the Court Jung's executed consent and a proposed final judgment as to Jung memorializing the authorized settlement.

The SEC's complaint alleged a third claim for relief – unjust enrichment – against relief defendant Hwang. Relief defendant Hwang has not answered the SEC's complaint, nor has he moved for summary judgment. The SEC hereby submits this notice of voluntary dismissal with respect to its unjust enrichment action against relief defendant Hwang in accordance with Fed. R. Civ. P. 41(a)(1)(A)(i).

Dated: September 19, 2019

Respectfully submitted,

*/s/ Gary Y. Leung*

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Securities and Exchange Commission

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 19th day of September 2019, I caused to be served the foregoing **PLAINTIFF SEC'S RULE 41(a)(1)(A)(i) NOTICE OF VOLUNTARY DISMISSAL OF ITS UNJUST ENRICHMENT CLAIM AGAINST RELIEF DEFENDANT HWANG** on the following parties entitled to service by the means indicated below:

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/s/ Gary Y. Leung  
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